

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ANGUS MORDANT,

Plaintiff,

- against -

CITINSIDER, LLC,
BROKERPULSE LLC,

Defendants.

Docket No. 18-cv-09054 (RA)

NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon the annexed declaration of James H. Freeman, Esq., dated March 4, 2019, which sets forth applicable legal authorities, and the exhibits attached thereto [Exhibit A: default judgments as judicial precedent for damages; Exhibit B: the amended complaint and exhibits; Exhibit C: the Affidavits of Service, filed November 29, 2019; Exhibit D: the Clerk’s Certificates of Default, filed December 27, 2019; and Exhibit E: the proposed Default Judgment], Plaintiff Angus Mordant (“Plaintiff”) will move the Court, before the Honorable Ronnie Abrams (U.S.D.J.), at Courtroom 1506 of the United States Courthouse, 40 Foley Square, New York, New York 10007 on any date and time as the Court may order (but not less than 14 days after service of this motion is effectuated), for an Order granting entry of default judgment pursuant to Rule 55(b)(2) of the Federal Rules of Civil Procedure in Plaintiff’s favor on the issues of liability and statutory damages of \$30,000 for copyright infringement under 17 U.S.C. § 501 against Defendants Citinsider LLC and Broker Pulse LLC (collectively “Defendants”), jointly and severally; for Plaintiff’s attorneys’ fees and costs in the amount of \$2625.00 and \$495.00 pursuant to 17 U.S.C. §505, respectively; for post-judgment interest under 28 U.S.C.A. § 1961; and for such further relief as this Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that pursuant to Local Civil Rule 6.1(b), opposition papers, if any, shall be served upon the undersigned by March 26, 2019, and reply papers, if any, shall be served by the undersigned by April 2, 2019.

PLEASE TAKE FURTHER NOTICE that pursuant to Local Civil Rule 55.2(c), service of a copy of this motion and annexed affidavit and exhibits upon Defendant shall be made at the last known business address of Defendants, and shall be deemed good and sufficient service thereof.

Dated: Valley Stream, New York
March 4, 2019

Respectfully submitted,

LIEBOWITZ LAW FIRM, PLLC

By: /jameshfreeman/

James H. Freeman
11 Sunrise Plaza, Suite 305
Valley Stream, New York 111580
(516) 233-1660
jf@liebowitzlawfirm.com

*Attorneys for Plaintiff
Angus Mordant*

TO:

BROKERPULSE LLC c/o SCHLUSSEL & BYALICK, LLP
7001 BRUSH HOLLOW ROAD S TE 214
WESTBURY, NEW YORK, 11590

Defendant BrokerPulse LLC

CITINSIDER LLC
373 PARK AVENUE SOUTH, 6TH FLR
NEW YORK, NEW YORK, 10016

Defendant Citinsider LLC